



CDSS

WILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES

744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

March 28, 2017

Mr. Charles Palmer
Civil Rights Coordinator
Los Angeles County Department of Public Social Services
12860 Crossroads Parkway South
City of Industry, CA 91746

Dear Mr. Palmer:

This letter is to advise you that the Corrective Action Plan you submitted on March 23, 2017 in response to the results of our July/August 2016 Civil Rights Compliance Review is tentatively approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator. With several corrective actions set to be completed after the completion of the county's 2017 review, please follow up via email with photos/documentation of these updates.

If you have any questions, please contact Daniel Cervantes (analyst) at (916) 654-0946. You may also contact your analyst by e-mail at Daniel.Cervantes@dss.ca.gov.

Sincerely,

Original signed by Tiffany Marsh

TIFFANY MARSH, Acting Chief
Civil Rights Unit
Welfare to Work Division

c: Jessica Alfaro, Human Services Administrator I

Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Tami Gutierrez, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Jacqueline Hom
State Refugee Coordinator

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Andrew Riesenber
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty



County of Los Angeles
DEPARTMENT OF PUBLIC SOCIAL SERVICES

12860 CROSSROADS PARKWAY SOUTH · CITY OF INDUSTRY, CALIFORNIA 91746
Tel (562) 908-8400 · Fax (562) 695-4801



SHERYL L. SPILLER
Director

ANTONIA JIMÉNEZ
Acting Chief Deputy

Board of Supervisors
HILDA L. SOLIS
First District

MARK RIDLEY-THOMAS
Second District

SHEILA KUEHL
Third District

JANICE HAHN
Fourth District

KATHRYN BARGER
Fifth District

March 23, 2017

Jim Tashima, Chief
Civil Rights Bureau
California Department of Social Services
744 P Street, M/S 8-16-70
Sacramento, CA 95814

Dear Mr. Tashima:

**CIVIL RIGHTS COMPLIANCE REVIEW FOR
LOS ANGELES COUNTY DEPARTMENT OF PUBLIC
SOCIAL SERVICES CONDUCTED JULY 25-29 AND AUGUST 23-25, 2016**

Enclosed is the Los Angeles County Department of Public Social Services' (DPSS) response to the findings identified in the California Department of Social Services (CDSS) 2016 Civil Rights Bureau's Los Angeles County Civil Rights Compliance Review Report, dated January 23, 2017. CDSS' review was conducted July 25-29 and August 23-25, 2016, and resulted in 23 findings.

As described in the enclosure, DPSS has completed corrective actions for 3 findings. Corrective action for the remaining 20 findings is scheduled for completion by December 31, 2017. A final status update will be provided to CDSS once all corrective action has been implemented.

If you have any questions, please let me know, or your staff may contact Francisca Campbell, Acting Division Chief, Research, Evaluation and Quality Assurance at (562) 908-5879.

Sincerely,

Original signed by Sheryl Spiller

Sheryl L. Spiller
Director

SLS:rc

Enclosure

**CDSS CIVIL RIGHTS COMPLIANCE REVIEW
FISCAL YEAR 2016-17**

**LOS ANGELES COUNTY DPSS RESPONSE TO
FINDINGS AND CORRECTIVE ACTIONS**

III. DISSEMINATION OF INFORMATION

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: SIGNAGE, POSTERS, PAMPHLETS

FINDING:

1. Distribution of CDSS' Pub 13.

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility. Div. 21-107.221

RECOMMENDATION

The County is required to use the latest version of the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" 06/11.

DPSS RESPONSE:

The Department will send a memo to the district offices reminding staff to distribute the latest version of Pub 13 "Your Rights Under California Welfare Programs" during Intake and Redetermination. The memo will contain instructions that include the requirement for staff to explain the information on the PUB 13 to participants and to document their actions on the LEADER Replacement System (LRS). Also, all Department public contact offices will provide confirmation to Line Operations Development during the General Staff meetings, that staff have been reminded to distribute the latest version of the Pub 13 during Intake and Redetermination.

Target Date: April 28, 2017

FINDING:

2. Instructional and directional signage.

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24

RECOMMENDATION

The County is required to use the latest version of form AD 475B, "And Justice for All" 12/99.

DPSS RESPONSE:

The Department received and distributed the new form AD 475B, "And Justice for All" poster. All Department public contact offices confirmed replacement of the old version with the new signage translated into appropriate languages.

Completed: November 21, 2016

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

METRO NORTH #38, 2601 Wilshire Blvd., Los Angeles, CA

FACILITY ELEMENT: WATER FOUNTAIN

FINDING:

3. Water fountain positioned in pedestrian walkway; floor space in front of water fountain only 40".

CORRECTIVE ACTION:

All drinking fountains shall be located completely within alcoves, positioned completely between wing walls, or otherwise positioned so as not to encroach into pedestrian ways. (CA T24 11B-602.9) pg. 304

The clear floor or ground space shall be 30" min. x 48" min. (CA T24 11B-305.3) (ADA 305.3) pg. 214

Wall and post-mounted cantilevered drinking fountains shall be 18" min. and 19" max. in depth. (CA T24 11B-602.8) pg. 304

DPSS RESPONSE:

The building's management removed the water fountain.

Completed: February 10, 2017

NORWALK #40, 12727 Norwalk Blvd., Norwalk, CA

FACILITY ELEMENT: PARKING

FINDING:

4. ADA parking does not meet minimum ADA standards. No proper access aisle, no proper van accessible space.

CORRECTIVE ACTION:

Car parking spaces shall be 18' long min. (CA T24 11B-502.2) (ADA 502.2) pg. 173

Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) pg. 173

Two parking spaces shall be permitted to share a common access aisle. (CA T24 11B-502.3) (ADA 502.3) pg. 173

Access aisles serving car parking spaces shall be 5' wide min. (CA T24 11B-502.3.1) (ADA 502.3.1) pg. 173

Access aisles shall extend the full required length of the parking spaces they serve. (CA T24 118-502.3.2) (ADA 502.3.2) pg. 173

DPSS RESPONSE:

The Internal Services Department (ISD) is transferring this project to a new Architectural Engineering (A/E) and Construction Company to correct the deficiencies stated in Finding 4 and 5. ISD has scheduled an evaluation with the new A/E and contractor to address relocating the current ADA parking spaces from the south side to the north side of the parking lot. The project will consist of two phases. Phase I includes: evaluation, scope of work, design and pricing with and established target completion date of May 31, 2017. Phase II includes: restriping of the parking spaces; curb cut to provide ADA access to the proper access aisle, and signage with and established target completion date of June 30, 2017.

Target Date: June 30, 2017

FACILITY ELEMENT: OUTSIDE SIGNAGE

FINDING:

5. No ADA directional signage indicating accessible path of travel from ADA accessible parking spaces.

CORRECTIVE ACTION:

Directional signs complying with "Visual Characters" heading in Section 57, Signs & Identification, including the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) pg. 28

DPSS RESPONSE:

ISD is transferring this project to a new Architectural Engineering (A/E) and Construction Company to correct the deficiencies stated in Finding 4 and 5. ISD has scheduled an evaluation with the new A/E and contractor to address relocating the current ADA parking spaces from the south side to the north side of the parking lot. The project will consist of two phases. Phase I includes: evaluation, scope of work, design and pricing with and established target completion date of May 31, 2017. Phase II includes: restriping of the parking spaces; curb cut to provide ADA access to the proper access aisle, and signage with and established target completion date of June 30, 2017.

Target Date: June 30, 2017

FLORENCE #17, 1740 E. Gage Ave., Los Angeles, CA

FACILITY ELEMENT: EXTERIOR ENTRANCE

FINDING:

6. Ramp leading into building's front entrance not ADA accessible.

CORRECTIVE ACTION:

The clear width of a ramp run shall be 48" min. (CA T24 11B-405.5) (ADA 405.5) pg. 183

Ramp runs shall have a running slope no steeper than 1:12. (CA T24 11B-405.2) (ADA 405.2) pg. 183

Cross slope of ramp runs shall not be steeper than 1:48. (CA T24 11B-405.3) (ADA 405.3) pg. 183

The rise for any ramp run shall be 30" max. (CA T24 11B-405.6) (ADA 405.6) pg. 183

Please see the most recent version of the California Accessibility Reference Manual, CA Title 24, and ADA requirements for further information to achieve compliance.

The findings at 1740 E. Gage Avenue, Los Angeles, CA 90001 unlawfully limit the access to persons in wheelchairs. Both the restroom and more importantly, the building's front entrance, must be made accessible immediately as to provide wheelchair access into the building.

DPSS RESPONSE:

A walkthrough with all stakeholders was conducted the week of February 20, 2017. ISD has secured a different contractor for this portion of the project. Approval from the Board of Supervisors is required before proceeding. It will take an estimated three to four months to obtain Board approval and another six to eight months to finish the work in phases.

Target Date: December 31, 2017

FACILITY ELEMENT: MEN'S RESTROOM

FINDING:

7. No ADA accessible stall in restroom.

CORRECTIVE ACTION:

Clearance around a water closet shall be 60" min. measured perpendicular from the side wall and 56" min. measured perpendicular from the rear wall. (CA T24 11B-604.3.1) (ADA 604.3.1) pg. 341

A min. 60" wide and 48" deep maneuvering space shall be provided in front of the water closet. (CA T24 11B-604.3.1) (ADA 604.3.1) pg. 341

The findings at 1740 E. Gage Avenue, Los Angeles, CA 90001 unlawfully limit the access to persons in wheelchairs. Both the restroom and more importantly, the building's front entrance, must be made accessible immediately as to provide wheelchair access into the building.

DPSS RESPONSE:

A walkthrough with all stakeholders was conducted the week of February 20, 2017. ISD has secured a different contractor for this portion of the project. Approval from the Board of Supervisors is required before proceeding. It will take an estimated three to four months to obtain Board approval and another six to eight months to finish the work in phases.

Target Date: December 31, 2017

FACILITY ELEMENT: WOMEN'S RESTROOM

FINDING:

8. No ADA accessible stall in restroom.

CORRECTIVE ACTION:

Clearance around a water closet shall be 60" min. measured perpendicular from the side wall and 56" min. measured perpendicular from the rear wall. (CA T24 11B-604.3.1) (ADA 604.3.1) pg. 341

A min. 60" wide and 48" deep maneuvering space shall be provided in front of the water closet. (CA T21 11B-604.3.1) (ADA 604.3.1) pg. 341

The findings at 1740 E. Gage Avenue, Los Angeles, CA 90001 unlawfully limit the access to persons in wheelchairs. Both the restroom and more importantly, the building's front entrance, must be made accessible immediately as to provide wheelchair access into the building.

DPSS RESPONSE:

A walkthrough with all stakeholders was conducted the week of February 20, 2017. ISD has secured a different contractor for this portion of the project. Approval from the Board of Supervisors is required before proceeding. It will take an estimated three to four months to obtain Board approval and another six to eight months to finish the work in phases.

Target Date: December 31, 2017

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: FINDINGS FROM PROGRAM MANAGER SURVEYS, STAFF INTERVIEWS AND CASE FILE REVIEWS

FINDING:

9. Effective services.

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are Non-English speaking or who have disabilities. Div. 21-115

DPSS RESPONSE:

The Department has several policies to ensure that persons with disabilities receive effective service. These policies include: (1) posters and brochures that are posted and available at district offices informing the public of their rights under the American with Disabilities Act (ADA) and how to request an accommodation; (2) availability of an ADA hotline where individuals can make a request for an accommodation by telephone; (3) availability of the ADA-PUB2, Request for Reasonable Modifications form, accessible via the DPSS website or at any district office, which individuals can complete to request an accommodation; and (4) the availability of a dedicated Title II coordinator whose

contact information is posted at district offices and who is available to assist with accommodations or questions for individuals visiting DPSS district offices.

In addition, the Department will release Civil Rights Memo (CRM) 17-01 on PA 481 Forms Discontinuance and Language Services Performance. This CRM will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CRM 17-01 during the Spring 2017 Civil Rights Liaison (CRL) meeting scheduled for March 29, 2017. CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL meeting, the Department will instruct CRLs to confirm they have shared the information with their staff.

Target Date: March 29, 2017

FINDING:

10. Timely services.

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115

DPSS RESPONSE:

The Department will release CRM 17-01 on PA 481 Forms Discontinuance and Language Services Performance, which will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CRM 17-01 during the Spring 2017 CRL meeting scheduled for March 29, 2017. CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL meeting, the Department will instruct CRLs to confirm they have shared the information with their staff.

Target Date: March 29, 2017

FINDING:

11. Interpreter services.

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services must offer and provide free interpreter services using qualified interpreters. Div. 21-104q (1) and 21-115

DPSS RESPONSE:

The Department will release CRM 17-01 on PA 481 Forms Discontinuance and Language Services Performance, which will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CR 17-01 during the Spring 2017 CRL meeting scheduled for March 29, 2017. CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL meeting, the Department will instruct CRLs to confirm they have shared the information with their staff.

Target Date: March 29, 2017

FINDING:

12. Written materials.

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services must use and provide translated forms, to include translated notice of action forms, 18. Div. 21-115.2

DPSS RESPONSE:

It is departmental practice to implement translated forms, including Notices of Action upon release by CDSS. The forms are implemented via the release of instructions to staff and updates to the County's case management system, LRS.

Completed: March 2, 2017

FINDING:

13. Additional findings.

During this compliance review, the reviewer encountered several instances where a participant (applicant/potential applicant) was in the office and obviously needed either a language or physical accommodation. There were at least five instances when the reviewer had to intervene and secure an interpreter for the participant. And in two other situations, the participant obviously needed help with an application, but again, the reviewer had to ensure a County employee would help the participant. In all of these instances, the County failed to provide accommodating services.

CORRECTIVE ACTION:

County welfare departments shall ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English speaking population and individuals with disabilities. The provision of bilingual/interpretive services shall be prompt without undue delays. Div. 21-115

DPSS RESPONSE:

DPSS has several policies to ensure that persons with disabilities receive effective service. These policies include: (1) posters and brochures that are posted and available at district offices informing the public of their rights under the ADA and how to request an accommodation; (2) availability of an ADA hotline where individuals may make a request for an accommodation by telephone; (3) availability of the ADA-PUB2, Request for Reasonable Modifications form, accessible via the DPSS website or at any district office, which individuals can complete to request an accommodation; and (4) the availability of a dedicated Title II coordinator whose contact information is posted at district offices and who is available to assist with accommodations or questions for individuals visiting DPSS district offices.

In addition, the Department will release CRM 17-01 on PA 481 Forms Discontinuance and Language Services Performance, which will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CRM 17-01 during the Spring 2017 CRL meeting scheduled for March 29, 2017. CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL meeting, the Department will instruct CRLs to confirm they have shared the information with their staff.

Target Date: March 29, 2017

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: FINDINGS FROM CASE FILE REVIEWS AND STAFF INTERVIEWS

FINDING:

14. Documentation if client provided own interpreter.

CORRECTIVE ACTION:

When applicants/recipients provide their own interpreter, the County Welfare Department (CWD) shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23

DPSS RESPONSE:

The Department will release CRM 17-01 on PA 481 Forms Discontinuance and Language Services Performance, which will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CRM 17-01 during the Spring 2017 CRL meeting scheduled for March 29, 2017. CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL meeting, the Department will instruct CRLs to confirm they have shared the information with their staff.

Target Date: March 29, 2017

FINDING:

15. Documentation of interpreter signed confidentiality statement.

CORRECTIVE ACTION:

Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24

DPSS RESPONSE:

The Department will release CRM 17-01 on PA 481 Forms Discontinuance and Language Services Performance, which will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CRM 17-01 during the Spring 2017 CRL meeting scheduled for March 29, 2017. CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL meeting, the Department will instruct CRLs to confirm they have shared the information with their staff.

Target Date: March 29, 2017

FINDING:

16. Documentation of primary language.

CORRECTIVE ACTION:

Each agency shall ensure that case record identification shows the applicants/recipient's ethnic origin and primary language. Div. 21-201.21

DPSS RESPONSE:

The Department will release CRM 17-01 on PA 481 Forms Discontinuance and Language Services Performance, which will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CRM 17-01 during the Spring 2017 CRL meeting scheduled for March 29, 2017. CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL meeting, the Department will instruct CRLs to confirm they have shared the information with their staff.

Target Date: March 29, 2017

FINDING:

17. Documentation that bilingual services were provided.

CORRECTIVE ACTION:

Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22

DPSS RESPONSE:

The Department will release CRM 17-01 on PA 481 Forms Discontinuance and Language Services Performance, which will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CRM 17-01 during the Spring 2017 CRL meeting scheduled for March 29, 2017. CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL meeting, the Department will instruct CRLs to confirm they have shared the information with their staff.

Target Date: March 29, 2017

FINDING:

18. General

During the entrance and exit meeting, the County discussed eliminating the language preference forms, known to the County as form PA 481. The form, if filled out properly, documents the client's spoken language and written language preference.

Division 21-116 states:

- .1 Each agency shall maintain case record documentation in sufficient detail to permit a reviewer to determine the agency's compliance with the requirements of Division 21.
- .2 Each agency shall ensure that case record documentation identifies the applicant's/recipient's ethnic origin and primary language in accordance with Section 21-201.21. In those cases, where the applicant/recipient is non-English speaking, the agency shall:
 - .21 Document the individual's acceptance or refusal of forms or other written material offered in the individual's primary language (HANDBOOK: see Section 21-115.2).
 - .22 Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter.

The discontinued use of this form will eliminate the only source of documentation the County provides in the case files. The use of the form is highly encouraged as it satisfies the documentation requirements detailed in Division 21.

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

DPSS RESPONSE:

The Department will release CRM 17-01 on PA 481 Forms Discontinuance and Language Services Performance, which will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CRM 17-01 during the Spring 2017 CRL Meeting scheduled for March 29, 2017. CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL Meeting, the Department will instruct CRLs to confirm they have shared the information with their staff. In addition, CRS staff will be conducting unannounced visits to district offices to ensure compliance by conducting a CR modified compliance review.

Target Date: March 29, 2017

VII. STAFF DEVELOPMENT AND TRAINING

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: INTERVIEW QUESTIONS

FINDING:

19. Division 21, Civil Rights Training.

The annual Civil Rights Compliance Review should provide an opportunity to train all Los Angeles County Department of Public Social Services staff, not just workers that are preselected to answer interview questions. Staff in the offices that were predetermined were much better prepared to answer the interview questions and provide participant accommodations and services.

During the unannounced office visits, staff were clearly distracted by the Civil Rights Compliance Review. In several situations, staff were reacting to the presence of the review/reviewer. Services to participants were only offered after a supervisor or another staff person explained that the reviewer was present. In one instance, a non-English speaker was offered interpretive services after 15 minutes of speaking English after a supervisor explained to the client that a Civil Rights Review was being conducted that day. Los Angeles County Department of Public Social Services staff need to always be aware of the need to provide services to participants who need them. Identification of language accommodation should be determined immediately upon the participant entering the office. The greeters in each office should identify the participant's primary language, and every subsequent worker should already be prepared to provide services in the participant's preferred language.

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1

DPSS RESPONSE:

The Department will continue to ensure that employees receive Civil Rights training at the time of orientation and on a biennial basis. In addition, the Department will release CRM 17-01 on PA 481 Forms Discontinuance and Language Services Performance, which will confirm and reinforce compliance with the corrective action recommendation. The Department will also present a comprehensive review of CRM 17-01 during the Spring 2017 CRL meeting scheduled for March 29, 2017.

CRLs will reinforce the subject matter with staff and supervisors at their respective meetings as they are primarily responsible for implementation and reinforcement of compliance with Civil Rights policies and procedures within their district operations. Following the March CRL Meeting, the Department will instruct CRLs to confirm they have shared the information with their staff.

Target Date: March 29, 2017

VIII. DISCRIMINATION COMPLAINT PROCEDURES

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: FINDINGS FROM STAFF INTERVIEWS AND PROGRAM MANAGER SURVEYS

FINDING:

20. Discrimination complaint process.

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203

DPSS RESPONSE:

During the Spring CRL Meeting, the Department will instruct office CRLs to review and reinforce staff knowledge of the discrimination complaint process. The Department's policy is for staff to send all complaints to CRS, as CRS staff have the knowledge and expertise required to assess discrimination complaints. In addition, CRS procedures include following up with complainants to clarify their complaints. This policy and practice ensures CRS' compliant handling of all discrimination complaints. CRS will review and reinforce this policy and procedure at the Spring 2017 CRL Meeting. In addition, Civil Rights compliance updates have been provided to Department Management staff including Directors and Deputies at Deputy District Director Forums, Deputy Dialogue meetings, and Director meetings. CRS has also increased communication with office CRLs via the added Modified Compliance Reviews being conducted throughout the year.

Target Date: March 29, 2017

FINDING:

21. Civil Rights Coordinator

CORRECTIVE ACTION:

Los Angeles County Department of Public Social Services shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

DPSS RESPONSE:

The Civil Rights Coordinator will instruct office CRLs at the Spring 2017 Meeting to reinforce staff knowledge of the Department's discrimination complaints process. The reinforcement will be based on reference to CRM 14-02, Provision of Interpretive Services and Documentation, dated September 24, 2014, and CRM 15-02, Reception Civil Rights Compliance Policies, Procedures and Resources, dated November 24, 2015. Each CRL will be required to independently confirm they have reinforced this policy with staff and supervisors at their respective meetings.

Target Date: March 29, 2017

X. CALL CENTER EVALUATION

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: FINDINGS FROM CALL/SERVICE CENTER SITE VISIT AND INTERVIEWS

FINDING:

22. Call Service Center

CORRECTIVE ACTION:

Over the past year, the call center has had several issues related to a participant getting in contact with their worker (a call center employee). Several times throughout the past

twelve months, Civil Rights has received several calls/complaints from concerned benefit recipients stating that they cannot get in touch with a (call center) worker because the number is not valid, the number is disconnected, or the phone just rings with no answer.

The issue has been presented to Los Angeles County Department of Public Social Services on a few occasions by advocates as well as Civil Rights Unit. To this day, the Civil Rights office receives complaints about not being able to get a hold of their worker via telephone. The issues remain unresolved.

DPSS RESPONSE:

The Customer Service Centers (CSC) have three local phone numbers and one toll-free number. The toll-free number is included in all participant correspondence and all numbers are included on our website and printed information. These numbers are valid and they are tested daily to ensure they are in working order.

Note, early last year, disconnections did occur during high call volume periods. To deal with high call volume periods, callers may receive the message "We are experiencing high call volume, please call back later." In addition to the message, the system capacity and infrastructure was expanded and participants were provided with options to Self-Serve if they chose or to call back at a later time. Additionally, the self-service option provided participants information related to their case and benefits.

By July 1, 2017, DPSS expects to have hired a consultant and recommendations on how to improve customer service will be provided by December 31, 2017. We will require an assessment on the systems and a focus group to enhance the caller navigation process. Additionally, we expect recommendations on how to reduce the high-volume message, including looking at increasing available lines or adding additional staff.

Target Date: December 31, 2017

XI. COMMUNITY INPUT

LOS ANGELES COUNTY DPSS

REVIEW ELEMENT: FEEDBACK FROM COMMUNITY AND ADVOCATE GROUPS

FINDING:

23. Community feedback

CORRECTIVE ACTION:

1. Advocates shared concerns that civil rights complaints are being buried under customer service complaints. They have concerns that customers are genuinely being treated differently, but presented by liaisons and the Civil Rights Coordinator as a customer service complaint, so the issue is never addressed properly.
2. Advocates shared their concern over the availability of the call center. They question how language access is being measured. They are concerned about the difference in wait times per language. They also expressed concern about the multiple layers of prompts to get to a live person.

DPSS RESPONSE:

1. Civil Rights complaints are not buried under customer service complaints. It is true that many Civil Rights complaints are customer services complaints.

DPSS is aware there are Civil Rights issues that are not submitted by customers. The Department submits dispositions for all complaints to CDSS for review and approval. DPSS is committed to ensure Civil Rights compliance and staff performance through continuous reinforcement of Department policies and procedures. The Department provides direction to designated office CRLs at meetings during the Spring and Fall and through the publication and implementation of policy reinforcement memos.

2. Please note, the advocate concerns appear to lack context as to how CSC manages calls in the queue. The CSCs work as one and all are staffed with bilingual Eligibility Workers (EW) for all threshold languages. The EWs are skilled by program knowledge and language. When the CSC gatekeepers see any call in a particular program is waiting abnormally longer, they will “re-skill” CSC staff to address that caller to ensure language needs. This could include engaging an English-speaking EW and he/she in turn uses the contracted translation services to assist.

By July 1, 2017, DPSS will have hired a consultant who will provide comprehensive recommendations by December 31, 2017, to enhance CSC operations. This includes ensuring appropriate language access/timeliness and more simplified CSC navigation.

Target Date: December 31, 2017